

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

LAW OFFICES OF NONA L. OSTROVE, LLC
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Attorneys for Le Club I Condominium Association, Inc.
BY: Nona L. Ostrove, Esq. NO 2942

In re: : IN BANKRUPTCY
: CHAPTER 13
John O. Poindexter, III :
: CASE NO. 17-14081/ABA
: :
Debtors : :

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Le Club I Condominium Association, Inc. through its attorney, Law Offices of Nona L. Ostrove, LLC, objects to confirmation of the debtor's Chapter 13 plan for the following reasons:

1. Le Club I Condominium Association, Inc. ("Le Club I") is a creditor of the debtor herein by reason of unpaid condominium assessments owed on the debtor's unit at 438 Kelham Ct. Mt. Laurel, NJ. These assessments are secured by provision of the Master Deed and various liens filed with the Burlington County Clerk's Office with the first lien having been filed as of November 28, 2006. A proof of claim has been filed confirming the balance due as of the filing of the petition, \$18,266.67 with copies of the accounting ledger and liens attached thereto.

2. Section 1328(a)(5)(B)(ii) of the Bankruptcy Code states that with respect to an allowed secured claim, the plan must provide for payment of "the value, as of the effective date of the plan, of property to be distributed under the plan on account of such claim is not less than the allowed amount of such claim;..." Section 1325(a)(5)(B)(i)(I) further states that the plan must provide that "the holder of such claim retain the lien securing such claim..."

3. The current plan filed by the debtor fails to provide for any payment to Le Club I. Le Club I objects to confirmation of the current plan proposed by the debtor unless the plan is amended to provide for payment in full of the secured claim of Le Club I and continuing payment of post-petition assessments due and owing to Le Club I

WHEREFORE, Le Club I Condominium Association, Inc. objects to confirmation of the Debtor's Chapter 13 plan unless the plan is modified to provide for payment of all assessments due and owing to Le Club I Condominium Association together with all allowed late fees, interest and attorney fees and costs together with all post-petition assessments that come due and for such further relief as the court may deem proper and just.

LAW OFFICES OF NONA L OSTROVE, LLC
Attorneys for Le Club I
Condominium Assoc. Inc.

BY: /s/Nona L. Ostrove
Nona L. Ostrove, Esq.

Dated: April 26, 2017